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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHA-RON HAINES,

Defendant.

Case No. 2:16-cr-00137-JAD-GWF

STIPULATION AND PROPOSED
ORDER TO CONTINUE
SENTENCING
(Second Request)

It is hereby stipulated and agreed, by and between Dayle Elieson, United States Attorney, through Richard Anthony Lopez, Assistant United States Attorney, and Andrea Luem, counsel for defendant Sha-ron Haines, that the sentencing currently scheduled for February 6, 2018, at 9:00 a.m., be VACATED and set for a date and time convenient for the Court, but no sooner than February 20, 2018.

This stipulation is entered into for the following reasons:

1. On December 8, 2017, the Probation Office provided the parties with the Presentence Investigation Report (PSR) for this case. Neither the Government nor the Defendant submitted objections to the PSR to the Probation Officer.

1 2. On January 30, 2018, the Defendant filed a sentencing memo that
2 raises for the first time objections to the PSR's calculation of the applicable advisory
3 Sentencing Guidelines range and to the PSR's description of the factual basis for the
4 Defendant's conviction.

5 3. The parties request a continuance of the sentencing date to provide the
6 Government with adequate time to address the Defendant's objections, as
7 contemplated by Local Criminal Rule 32-1.

8 4. The Defendant is in custody serving a 156-month sentence for his sex
9 trafficking conviction in Case No. 2:14-cr-00264-APG-NJK and does not object to the
10 continuance.

11 5. This is the second request for a continuance of the sentencing date.

12 DATED this 30th day of January, 2018.

13 Respectfully submitted,

14 DAYLE ELIESON
15 United States Attorney

16 /s/ Andrea Luem
17 ANDREA LUEM, ESQ.
18 Counsel for Defendant Sha-ron Haines

19 /s/ Richard Anthony Lopez
20 RICHARD ANTHONY LOPEZ
21 Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 SHA-RON HAINES,

7 Defendant.

Case No. 2:16-cr-00137-JAD-GWF

8 **FINDINGS OF FACT**

9 Based on the parties' stipulation to continue the sentencing date, and good
10 cause appearing therefore, the Court finds that:

11 1. On December 8, 2017, the Probation Office provided the parties with
12 the Presentence Investigation Report (PSR) for this case. Neither the Government
13 nor the Defendant submitted objections to the PSR to the Probation Officer.

14 2. On January 30, 2018, the Defendant filed a sentencing memo that
15 raises for the first time objections to the PSR's calculation of the applicable advisory
16 Sentencing Guidelines range and to the PSR's description of the factual basis for the
17 Defendant's conviction.

18 3. The parties request a continuance of the sentencing date to provide the
19 Government with adequate time to address the Defendant's objections, as
20 contemplated by Local Criminal Rule 32-1.

21 4. The Defendant is in custody serving a 156-month sentence for his sex
22 trafficking conviction in Case No. 2:14-cr-00264-APG-NJK, and does not object to the
23 continuance.

5. This is the second request for a continuance of the sentencing date.

CONCLUSIONS OF LAW

6. For all of the above-stated reasons, the ends of justice would best be served by a continuance of the sentencing date.

ORDER

IT IS HEREBY ORDERED that the sentencing currently scheduled for February 6, 2018, at the hour of 9:00 a.m. be continued to February 26, 2018 at the hour of 9:30 a.m. in Las Vegas Courtroom 6D before Judge Jennifer A. Dorsey.

DATED: 1/31/2018

HONORABLE JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE

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Dated: January 30, 2018

/s/ Richard Anthony Lopez
RICHARD ANTHONY LOPEZ
Assistant United States Attorney